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*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*A.P. v. Uber Technologies, Inc. et al., No. 3:25-  
cv-02105-CRB*

*Arpitkumar Patel v. Uber Technologies, Inc., et  
al; No. 3:25-cv-05287-CRB*

*Jane Doe L.S. 618 v. Uber Technologies, Inc. et  
al., No.3:25-cv-06160-CRB*

*K.L. v. Uber Technologies, Inc., et al; 3:25-cv-  
06178-CRB*

MDL No. 3084 CRB

**DECLARATION OF RACHEL B.  
ABRAMS IN SUPPORT OF OPPOSITION  
TO DEFENDANTS' MOTION TO  
DISMISS DUPLICATE CASES**

1 I, Rachel B. Abrams, declare:

- 2 1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway and Wise, LLP. I am  
3 admitted to practice before this Court. I make this declaration based on my own personal  
4 knowledge. If called upon to testify, I could and would testify competently to the truth  
5 of the matters stated herein:
- 6 2. On February 28, 2025, Peiffer Wolf Carr Kane Conway & Wise filed a complaint on  
7 behalf of Plaintiff A.P. alleging sexual assault or harassment by an Uber driver in New  
8 Jersey on June 27, 2023. *Complaint, A.P. v. Uber Technologies, Inc. et al., No. 3:25-cv-*  
9 *02105-CRB, ECF No. 1* (N.D. Cal. Feb. 28, 2025).
- 10 3. On June 27, 2025, Plaintiff A.P. filed a second complaint relating to the June 2023  
11 incident this time through the Ben Martin Law Group and abandoning the pseudonym.  
12 *Patel v. Uber Technologies, Inc. et al., No. 3:25-cv-05287-CRB, ECF No. 1* (N.D. Cal.  
13 June 27, 2025).
- 14 4. On August 31, 2025, counsel for Defendants notified Peiffer Wolf and Ben Martin Law  
15 Group that they believed that both firms filed claims on behalf of Plaintiff A.P.
- 16 5. After discussions and confirming dual representation of Plaintiff A.P., on October 16,  
17 2025, Peiffer Wolf and Ben Martin Law Group resolved the dual representation issue,  
18 agreeing that Peiffer Wolf's case will remain, and Ben Martin Law Group will dismiss  
19 their case.
- 20 6. On July 22, 2025, Plaintiff Jane Doe LS 618, through counsel at Levin Simes, LLP, filed  
21 a complaint alleging that an Uber driver sexually assaulted or harassed her in Dallas,  
22 Texas, on July 29, 2023. *Complaint, Jane Doe L.S. 618 v. Uber Technologies, Inc. et al.,*  
23 *No.3:25-cv-06160-CRB, ECF No. 1* (N.D. Cal. July 22, 2025).
- 24 7. One day later, on July 23, 2025, Plaintiff filed a second complaint relating to the July  
25 2023 incident under a different pseudonym through counsel at Peiffer Wolf Carr Kane  
26 Conway & Wise. *Complaint, K.L. v. Uber Technologies, Inc. et al., No. 3:25-cv-06178-*  
27 *CRB, ECF No. 1* (N.D. Cal. July 23, 2025).
- 28 8. On August 21, 2025, counsel for Defendants notified Peiffer Wolf and Levin Simes that

1 both firms filed claims on behalf of Plaintiff K.L.

2 9. Peiffer Wolf reached out to Levin Simes numerous times in an effort to resolve this dual  
3 representation issue.

4 10. After a discussion and confirming dual representation of Plaintiff K.L., on October 28,  
5 2025, the firms resolved the dual representation issue, agreeing that Levin Simes will  
6 continue with their case, and Peiffer Wolf will dismiss their case on behalf of Plaintiff  
7 K.L.

8 Executed this 28<sup>th</sup> day of October, 2025 in San Francisco, California.

9 /s/ Rachel B. Abrams  
10 Rachel B. Abrams

11 *Counsel for Plaintiff*  
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